

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND  
IRBESARTAN PRODUCTS LIABILITY  
LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Honorable Sharon A. King,  
Magistrate Judge

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO  
DEFENDANT THE HARVARD DRUG GROUP, L.L.C., D/B/A  
MAJOR PHARMACEUTICALS**

**WHEREAS** the Court entered Case Management Order No. 15-A, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated losartan- and irbesartan-containing drugs (“LCDs and ICDs”);

**WHEREAS** Defendant The Harvard Drug Group, L.L.C., d/b/a Major Pharmaceuticals (“Major”) having provided the information and documents required by Case Management Order No. 15-A, and having agreed to the tolling provisions therein;

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiffs Executive Committee and Major that all current cases pending and all future cases to be filed in this MDL alleging claims against Major in connection with allegedly contaminated LCDs and ICDs be and hereby are dismissed without prejudice.

/s/Marlene Goldenberg

Marlene Goldenberg  
Goldenberg Law, PLLC  
800 LaSalle Avenue  
Suite 2150  
Minneapolis, MN 55402  
On behalf of Plaintiffs' Executive  
Committee

Dated: June 10, 2022

/s/Daniel Campbell

Daniel Campbell  
Crowell & Moring LLP  
On behalf of Defendant  
The Harvard Drug Group, L.L.C., d/b/a  
Major Pharmaceuticals

Dated: June 10, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2022, I electronically filed the foregoing document using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ *Keith A. Kaider*

Keith A. Kaider